

## EXHIBIT 2

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS**

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IN RE: DEALER MANAGEMENT SYSTEMS  
ANTITRUST LITIGATION

MDL No. 2817  
Case No. 18 C 864

This Document Relates to All  
Cases

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**DECLARATION OF ROBERT VANCavage IN SUPPORT OF THE  
MOTION FOR APPOINTMENT OF THE MILBERG TADLER GROUP TO LEAD  
THE DEALERSHIP CLASS ACTION**

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Robert Vancavage declares pursuant to 28 U.S.C. § 1746:

1. I am President of the New York State Automobile Dealers Association (“NYSADA”), a position that I have held for over the past twenty (20) years.
2. I have personal knowledge of the matters stated herein and, if called upon, I could and would competently testify thereto.
3. I submit this declaration in support of the Motion For Appointment of the Milberg Tadler Group To Lead The Dealership Class Action.
4. Founded in 1923, NYSADA actively represents approximately one thousand (1000) franchised new car and truck dealers in New York State.
5. NYSADA acts as the local, statewide and national advocate for our member franchised dealers, and is committed to promoting and maintaining a competitive automotive industry for our members across the Empire State.
6. Among the fifty (50) State automobile dealer associations, NYSADA is considered and recognized as a leader based upon the prominence of New York as one of the largest auto markets in the world. In this respect, NYSADA often takes the lead in formulating legislation regulating manufacturer-dealer relations; responding to

manufacturer policy issues and, thereby, affecting the rights of franchised automobile dealers across the nation.

7. It is critical for the benefit of our dealer members and the Association that NYSADA align itself with the most qualified and experienced dealer and industry legal counsel. NYSADA is familiar with the limited number of law firms that provide legal representation to the dealer community nationwide. It is important for NYSADA to retain legal representation that is not only familiar with dealer issues and problems but is respected by auto manufacturers and industry vendors so that important resolutions and settlements can be achieved. Based upon the nationally recognized experience and reputation of Leonard Bellavia, Esq. in the automotive industry over the past 30 years, NYSADA has chosen Bellavia Blatt to act as its outside counsel. Mr. Bellavia is widely regarded as one the most, if not the most, prominent attorneys in the country who practices in the area of automotive franchise law. His firm is the “go to” firm in the auto industry for franchised automobile dealers with respect to any issue that they face.
8. Many NYSADA dealer members have retained Bellavia Blatt to spearhead legal action based upon the firm’s unique understanding of the auto industry. Bellavia Blatt is a trusted law firm among dealers, and its representation of large groups of dealers in mass action lawsuits demonstrates its ability and effectiveness in achieving consensus among dealers.
9. The vast majority of our dealer members use CDK Global, LLC (“CDK”) or The Reynolds and Reynolds Company (“Reynolds”) for Dealer Management System (“DMS”) software. In terms of automobile franchise law experience and intimate knowledge of the role of DMS software in the industry, I know that Bellavia Blatt has

a high level of experience, expertise, and professional deference amongst dealers and software providers.

I declare under penalties of perjury, under the laws of the United States, that the foregoing is true and correct to the best of my knowledge and belief.

Executed this 23<sup>rd</sup> day of March, 2018.



Robert Vancavage